

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES SHELTON)
)
)
 Plaintiff,) Case No. 2:24-cv-04679-JP
)
 v.)
)
 COMMITTEE FOR POLICE OFFICERS)
 DEFENSE PAC)
)
 Defendant)
)

**STIPULATION FOR AN EXTENSION OF TIME
TO RESPOND TO MOTION TO DISMISS**

COMES NOW Plaintiff James Shelton and Defendant Committee for Police Officers Defense PAC (“CPOD”), by and through their undersigned counsel, and hereby respectfully file this motion for an extension of time to respond to the Motion to Dismiss filed at Doc. 21. Plaintiff seeks until December 26, 2024 to oppose or otherwise respond to the Motion.

Plaintiff conferred with counsel for Defendant in this matter and Defendant does not oppose this request for an extension of time.

STATEMENT OF FACTS AND PROCEDURAL POSTURE

1. On September 5, 2024, Plaintiff James Shelton filed a class action complaint against Defendant CPOD. (Doc. 1.)
2. On November 25, 2024, Defendant filed a motion to dismiss the Plaintiff's complaint. (Doc. 21.)
3. This request for an extension of time is made for good cause and is not

intended to cause undue delay. *See Fed R. Civ. P. 6(b).*

4. This request for an extension of time is necessary for several reasons. First, the motion is procedurally complex, seeks dismissal on multiple grounds, and requires the review of the evidence and declarations to prepare a substantive and complete response. Moreover, the motion currently comes due shortly after the Thanksgiving holiday and in the lead up to Christmas. Accordingly, counsel needs time to adequately review and respond to the Motion.

WHEREFORE, for all the above reasons, the parties hereby stipulate that Plaintiff shall have until December 26, 2024, to oppose or otherwise respond to Defendant's Motion to Dismiss.

Respectfully submitted on November 26, 2024.

PERRONG LAW, LLC

/s/ Andrew Roman Perrong
Andrew Roman Perrong
2657 Mt. Carmel Ave.
Glenside, PA 19038
Tel.: (215) 225-5529
Fax: (888) 329-0305
Attorney for Plaintiff

DUANE MORRIS LLP

/s/ Daniel R. Walworth
Daniel R. Walworth (PA #204968)
Aleksander W. Smolij (PA #329521)
30 South 17th Street
Philadelphia, PA 19103
Tel.: (215) 979-1194
Fax: (215) 405-2917
dwalworth@duanemorris.com
awsolij@duanemorris.com

BERNHOFT LAW FIRM, S.C.

/s/ Patrick Kane
Patrick Kane
Pro Hac Vice forthcoming
Texas Bar No. 24115685

1710 W. 6th Street
Austin, TX 78703
(512) 582-2100 telephone
(512) 373-3159 facsimile
ptkane@bernhoftlaw.com

So **ORDERED** this 27th day of November, 2024.

/s/ John R. Padova

JOHN R. PADOVA, J.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 26, 2024, a true and accurate copy of the foregoing was filed with the Court using the Clerk of Court's electronic filing system, which by its operation will send notice of this filing to all parties that have entered an appearance in this matter.

/s/Andrew Roman Perrong
Andrew Roman Perrong